

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(COLUMBIA DIVISION)**

The Cincinnati Insurance Company, *et al.*,)
 Plaintiffs,)
)
 v.)
 Meetze Plumbing Co., Inc., *et al.*,)
 Defendants.)
 _____)

Case No. 3:20-cv-02719-SAL

**Motion in Support of
Pro Hac Vice Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Richard Steven DeGeorge be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

☐ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose

☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

This 12th day of May, 2021.

/s/ Benjamin C. DeCelle
 David C. Kimball
 Fed. ID No. 10475
 dkimball@robinsonbradshaw.com

Benjamin C. DeCelle
 Fed. ID No. 12995
 bdecelle@robinsonbradshaw.com

ROBINSON, BRADSHAW & HINSON, P.A.
202 E. Main St., Suite 201
Rock Hill, SC 29730
Telephone: (803) 325-2900
Facsimile: (803) 325-2929

Attorneys for Defendant Meetze Plumbing Co., Inc.